

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO.: 04- 11572 JLT

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SUSAN COONEY, )  
Plaintiff, )  
v. )  
SAYBROOK GRADUATE SCHOOL )  
AND RESEARCH CENTER and )  
MAUREEN O'HARA, )  
Individually, )  
Defendants. )  
)

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DEFENDANTS' EXPERT DISCLOSURE PURSUANT TO FEDERAL RULE OF CIVIL  
PROCEDURE 26(a)(2)(B)

Defendants, Saybrook Graduate School and Research Center and Maureen O'Hara, disclose the following experts pursuant to Fed. R. Civ. P. 26(a)(2)(B):

1. Nancy L. Segreve, MA, CRC  
Occupational Resource Network, Inc.  
305 North Main Street  
Andover, Massachusetts 01810

Nancy Segreve is a vocational expert who will opine to the plaintiff's labor market skills and transferable skills, including her ability to obtain employment with her Ph.D. in Psychology. Additionally, Ms. Segreve will opine on Ms. Cooney's potential earning capacity based on Ms. Cooney's background and education, including her Ph.D. in Psychology. More specifically, Ms. Segreve will testify to all the opinions, and the basis for those opinions, which are contained in her report, a copy of which is attached as Exhibit A.

Ms. Segreve will base her testimony upon vocational and labor market research and her review of the following documents: Amended Civil Complaint and Demand for Jury Trial; Defendants' Amended Answer to Plaintiff's Amended Complaint and Jury Demand; Saybrook Institute Interim Catalog 1994-1995; Deposition of Susan Cooney taken on 1/26/06; Deposition of Susan Cooney taken on 1/27/06; Deposition Exhibits 1-28; Records produced by Dr. David Reisen; Saybrook's Production of Documents date stamped S01784 – S01804; S01809 – S01925; S01966 – S01967; S02042 – S02045; S02071 – S02084; and, Deposition of Dennis K. Norman taken on 5/2/06. A copy of Nancy Segreve's curriculum vitae, which contains information pertaining to her expert testimony and deposition testimony is attached as Exhibit B.

Nancy Segreve is to be compensated as follows for the designated services: \$150 per hour for her expert services. Additionally, Ms. Segreve will be compensated at a rate of \$150 per hour for court trial and deposition time, with a four hour minimum.

2.     Elizabeth L. Leonard, Ph.D.  
Neurocognitive Associates, P.C.  
20 Hope Avenue Suite G01  
Waltham, MA 02553

Dr. Leonard is a Licensed Psychologist Provider who will opine as to the causal connection, if any, between the plaintiff's alleged emotional distress and any actions, or inactions, by the defendants, as well as plaintiff's inability to obtain her license as a psychologist in Massachusetts. More specifically, Dr. Leonard will testify to all the opinions, and the basis for those opinions, which are contained in her report, a copy of which is attached as Exhibit C.

Dr. Leonard will base her testimony upon her review of the following documents: Amended Civil Complaint and Demand for Jury Trial; Defendants' Amended Answer to

Plaintiff's Amended Complaint and Jury Demand; Saybrook Institute Interim Catalog 1994-1995; Deposition of Susan Cooney taken on 1/26/06; Deposition of Susan Cooney taken on 1/27/06; Deposition Exhibits 1-28; Records produced by Dr. David Reisen; Saybrook's Production of Documents bate stamped S01784 – S01804; S01809 – S01925; S01966 – S01967; S02042 – S02045; S02071 – S02084; and, Deposition of Dennis K. Norman taken on 5/2/06. A copy of Dr. Leonard's curriculum vitae is attached as Exhibits D.

In the last four years, Dr. Leonard has given expert testimony in the following cases: Fischer, Lauren and Louis Couto II v. Frank Powers, Ph.D. et al., Arizona CV 2002-011298; Kate Villegas v. United States of America et al., Arizona CIV 01 2417 PHX FJM; Breaux Raimy, et al. v. Dr. Otto Remedios, et al., Louisiana 24th JDC - No. 514-347, Div. A; Commonwealth of Massachusetts v. Alexander Pring-Wilson, Massachusetts Superior Court No: 2003-684; Debra Silverman v. Michael C. Dalin - Massachusetts Superior Court CV 2002-01-753; Novartis Consumer Health v. Helene K. Murphy, - Massachusetts Superior Court CV 0509970.0903; Michael Harvey et al. v. Catherine Freer Wilderness Therapy Expeditions Inc., Nevada Case No: A482947.

Dr. Leonard is to be compensated as follows for the designated services: \$350 per hour for her services as an expert, with a four hour minimum for deposition testimony. Court testimony is to be compensated as \$2,000 per half day, and \$500 for each hour thereafter.

Respectfully Submitted By,

Counsel for Defendants,  
SAYBROOK GRADUATE SCHOOL AND  
RESEARCH CENTER  
and MAUREEN O'HARA

/s/Grace V. Bacon Garcia

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Michael F. Aylward, BBO #024850  
Grace V. Bacon Garcia, BBO #640970  
**Morrison Mahoney LLP**  
250 Summer Street  
Boston, MA 02210  
Tel. (617) 439-7500  
(617) 439-7500

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 13, 2006.

/s/Grace V. Bacon Garcia

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Grace V. Bacon Garcia, BBO #640970